

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD MAY 1, 2023 THROUGH JULY 31, 2023**

Debtor: LTL Management LLC

Applicant: Bates White, LLC

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition  
Date")

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**SECTION 1  
FEE SUMMARY**

☐ Interim Fee Application No. \_\_\_\_\_ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from May 1, 2023 through July 31, 2023 (the "Second Statement Period").

Total Fees – LTL Bankruptcy:	\$2,867,231.75
Total Fees – Imerys Bankruptcy (50% of total):	+ \$0.00
Total Fees:	\$2,867,231.75
Total Disbursements:	+ \$2,274.64
Total Fees Plus Disbursements:	\$2,869,506.39
Minus 20% Holdback of Fees:	– \$573,446.35
Amount Sought at this Time:	\$2,296,060.04

	<u>FEES</u>	<u>EXPENSES</u>	<u>TOTAL</u>
Total Previous Fees Requested:	\$125,033.00	\$0.00	\$125,033.00
Total Fees Allowed to Date:	\$0.00	\$0.00	\$0.00
Total Retainer (If Applicable):	\$347,805.00 <sup>1</sup>	N/A	\$347,805.00
Total Holdback (If Applicable):	\$25,006.60	\$0.00	\$25,006.60
Total Received by Applicant:	\$447,831.40	\$0.00	\$447,831.40

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<sup>1</sup> Prior to this bankruptcy filing, Bates White received a payment from LTL of \$350,000.00. From April 1 through April 4, 2023, Bates White incurred \$2,195.00 in professional fees for services provided to the Debtor, which were to be paid by deducting those fees from the pre-filing payment.

**Summary by timekeeper included in this Fee Application – LTL Bankruptcy**

Name of Professional	Title	Rate	Hours	Fees
Chandler, Kathleen	Partner	\$825	25.2	\$20,790.00
Evans, Andrew	Partner	\$1,000	284.0	\$284,000.00
Gallardo-Garcia, Jorge	Partner	\$1,000	2.9	\$2,900.00
Lobel, Scott	Partner	\$875	259.4	\$226,975.00
Mullin, Charles	Partner	\$1,375	190.0	\$255,406.25
Scher, Benjamin	Partner	\$1,000	7.5	\$7,500.00
Kennedy, Pauline	Principal	\$800	8.4	\$6,720.00
Xu, Alicia	Managing Economist	\$625	1.6	\$1,000.00
Duncan, Taylor	Managing Consultant	\$550	0.3	\$165.00
Peters, Sarah	Managing Consultant	\$675	403.8	\$271,282.50
Leander, Ellen	Managing Research Specialist	\$480	4.7	\$2,256.00
Lin, Dajun	Senior Economist	\$550	64.7	\$35,585.00
Wang, Jinwen	Senior Economist	\$575	20.5	\$11,787.50
Malkov, Egor	Economist	\$525	418.1	\$219,502.50
Odio-Zuniga, Mariana	Economist	\$525	427.3	\$224,332.50
Habiger, Conor	Senior Consultant	\$500	123.4	\$61,700.00
Sherman, Samuel	Senior Consultant	\$480	38.4	\$18,432.00
Stewart, Samantha	Senior Consultant	\$520	471.7	\$244,842.00
Wieman, Christopher	Senior Data Engineer	\$625	3.5	\$2,187.50
Post, Douglas	Data Engineer II	\$500	32.4	\$16,200.00
Coleman, Nathan	Consultant II	\$465	271.3	\$126,154.50
Morey, Austin	Consultant II	\$435	430.4	\$187,224.00
Osgood, Jessie	Consultant II	\$450	1.1	\$495.00
Swope, Madison	Consultant II	\$435	501.1	\$217,978.50
McBride, Hannah	Consultant	\$410	422.9	\$173,389.00
Newcomb, Benjamin	Consultant	\$395	72.4	\$28,598.00
Villani, Joseph	Consultant	\$410	430.5	\$176,505.00
Dittbrenner, Susan	Senior Project Assistant	\$480	5.5	\$2,640.00
Arbor, Mary	Project Coordinator	\$280	2.0	\$560.00
Downey, Marguerite	Project Coordinator	\$280	1.0	\$280.00
Jain, Mahima	Data Specialist	\$280	131.5	\$36,820.00
Krombach, Jennifer Kim	Research Specialist	\$280	10.8	\$3,024.00
<b>TOTAL</b>			<b>5,068.3</b>	<b>\$2,867,231.75</b>

**Summary by timekeeper included in this Fee Application – Imerys Bankruptcy**

Name of Professional	Title	Rate	Hours	Fees
N/A			N/A	N/A
<b>TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>
<b>50% OF TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>

**SECTION II  
SUMMARY OF SERVICES**

<b>SERVICES RENDERED – LTL BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
Analysis	2,354.1	\$1,395,390.50
Client Communication	174.9	\$140,058.00
Data Analysis	620.3	\$264,827.00
Data Gathering & Processing	452.7	\$204,873.50
Fee Request Preparation	44.4	\$31,566.50
Project Management	110.9	\$85,989.50
Report	776.6	\$474,077.50
Research	476.5	\$219,647.00
Testimony	43.9	\$43,234.00
Travel (billed at 50% of hourly rate)	14.0	\$7,568.25
<b>SERVICE TOTALS</b>	<b>5,068.3</b>	<b>\$2,867,231.75</b>

<b>SERVICES RENDERED – IMERY'S BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
N/A	N/A	N/A
<b>SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>
<b>50% OF SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENT TYPE – LTL BANKRUTPCY</b>	<b>AMOUNT</b>
Billable Lodging	\$900.96
Billable Travel	\$1,046.18
Mileage	\$327.50
<b>DISBURSEMENTS TOTAL</b>	<b>\$2,274.64</b>

<b>DISBURSEMENT TYPE – IMERY'S BANKRUTPCY</b>	<b>AMOUNT</b>
N/A	N/A
<b>DISBURSEMENTS TOTAL</b>	<b>\$0.00</b>

#### **SECTION IV CASE HISTORY**

1. Case Filed: April 4, 2023 (the “Petition Date”)
2. Chapter under which case commenced: Chapter 11
3. Date of Retention: June 7, 2023, effective as of the Petition Date [Dkt. 723] (the “Retention Order”).<sup>2</sup>
4. Summary explaining the nature of the work performed and the results achieved:<sup>3</sup>

During the Second Statement Period, Bates White provided the following services including, but not limited to:

- Preparing Dr. Mullin’s initial and rebuttal expert reports in preparation for hearing on the motions to dismiss.
- Responding to analysis from opposing experts and preparing Dr. Mullin’s rebuttal expert report (including supporting analyses) in preparation for the hearing on the motions to dismiss.
- Preparing for and attending Dr. Mullin’s deposition and hearing testimony on the motions to dismiss.
- Developing and implementing framework for analyzing current and future claims.
- Processing and analyzing data related to talc claims.
- Processing and analyzing publicly available disease incidence data.
- Assisting Debtor’s counsel on matters related to the plan and proposed trust.

I certify under penalty of perjury that the above is true.

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<sup>2</sup> The Retention Order is attached hereto as Exhibit B.

<sup>3</sup> The invoice detail and expense detail submitted hereto as Exhibit C and Exhibit D, respectively, includes detailed time entries and expense entries summarizing the professional services rendered by Bates White, LLC as talc consultants to the Debtor in the LTL Bankruptcy.

Dated: September 1, 2023  
Washington, DC

Respectfully submitted,

/s/ Scott M. Lobel

Scott M. Lobel

BATES WHITE, LLC

2001 K Street NW

North Building, Suite 500

Washington, DC 20006

Telephone: (202) 408-6110

Facsimile: (202) 408-7838

E-mail: [scott.lobel@bateswhite.com](mailto:scott.lobel@bateswhite.com)

TALC CONSULTANTS FOR DEBTOR